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July 17, 2012

Attn: Invitations to Comment Administrative Office of the Courts 455 Golden Gate Ave. San Francisco, CA 94102 invitations@jud.ca.gov

Re: Public Comment re: Item SP12-05, the Strategic Evaluation Committee Report

to the Judicial Council

To Whom It May Concern:

I am writing on behalf of Legal Services of Northern California (LSNC) to provide public comment to the Judicial Council as it considers the recommendations of the Strategic Evaluation Committee. LSNC respectfully requests that the Judicial Council and its Executive Committee consider the impact of each of the SEC's recommendations on the public and especially upon California's most vulnerable populations.

We commend the Judicial Council for adopting this public comment process, allowing additional time to supplement the information in the SEC report. This will allow additional voices to be heard and will allow a careful analysis of the report.

LSNC's mission is to provide quality legal services to empower the poor to identify and defeat the causes and effects of poverty within their communities efficiently utilizing all available resources.

We request that the Judicial Council consider the following as it reviews the recommendations.

- The Judicial Council, and therefore also the Administrative Office of the Courts (AOC), must maintain as a central part of its mission preserving access to the courts for all Californians.
- The SEC Report Recommendations must be viewed within the larger context of the work that the AOC does to promote public trust and confidence in the state courts.
- 3. A simple cost-benefit analysis is not the only appropriate measurement of the value of the AOC's work and programs.

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4. The Judicial Council should recognize the value of the function of the AOC through its diverse programs.

LSNC respectfully requests that the Judicial Council and its Executive Committee recognize the potential impact on the public and vulnerable Californians as the implementation of each recommendation is analyzed. LSNC also recommends that additional public comment periods be used as specific, individual recommendations are considered for additional implementation. It is our understanding that legal services nonprofits and their attorneys may not have been consulted during the development of the SEC report. Therefore, we would welcome the opportunity to provide more detailed comment on specific recommendations as they are considered for further implementation.

Very truly yours,

Gary F. Smith
Executive Director